

Jared B. Pearson, Bar No. 12200
Pearson Law Firm, PLLC
9192 South 300 West, Suite 35
Sandy, Utah 84070
Telephone: (801) 888-0991

IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF UTAH	
IN RE:	Case No. 21-24679
TAMMY ELIZABETH MORALES- DELCID. Debtor.	Judge: Joel T. Marker Chapter 13
OBJECTION TO TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO SUBMIT 2021 TAX RETURNS/REFUNDS	

Debtor, by and through counsel of record, Jared B. Pearson, hereby objects to the Trustee's Motion to Dismiss for Failure to Submit her 2021 Tax Returns/Refunds. Debtor filed her 2021 taxes but is in the process of tracking down a copy of the returns.

THEREFORE, Debtor respectfully requests that the Court deny the Trustee's Motion to Dismiss and allow Debtor 30 days to provide a copy of her 2021 tax returns. Debtor further requests that attorney fees be awarded pursuant to the fee application filed herewith.

DATED: September 19, 2022

/s/ Jared B. Pearson
JARED B. PEARSON
Attorney for Debtor(s)

MAILING CERTIFICATE

The undersigned hereby certifies that on September 19, 2022, a true and correct copy of the foregoing pleading was sent by U.S. Mail, first class, postage-prepaid, or by electronic notification to the following:

Office of the U.S. Trustee
9 Exchange Place, Suite 100
Salt Lake City, Utah 84111

By Electronic Notification

Chapter 13 Trustee

By Electronic Notification

/s/ Jared B. Pearson

Jared B. Pearson